

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-62

ZACHARY WAITE,

Defendant.

MOTION TO MODIFY CONDITIONS OF BAIL

NOW COMES the defendant, Zachary Waite (Waite), through his attorney, Daniel H. Sanders, and hereby moves the Court to modify the conditions of bail in the above-captioned matter. Specifically, Waite requests the Court to modify his conditions to allow him to travel to Pewaukee, WI from April 18, 2022 to April 19, 2022.

In support of this motion, undersigned counsel provides the following:

1. On February 22, 2021, a criminal complaint alleging conspiracy to possess controlled substances with the intent to deliver, maintaining a drug trafficking place, and possession of a firearm in relation to a drug trafficking offense was filed against Waite. (D.

1). Waite was arrested on March 8, 2021.

2. On March 11, 2021, after a detention hearing, Waite was ordered detained pending trial. (D. 7).

3. On March 16, 2022, Waite was indicted on charges consistent with the offenses alleged in the criminal complaint. (D. 9).

4. On May 20, 2021, at a bail review hearing, the Court ordered Waite released

pending trial. (D. 16).

5. On May 28, 2021, the Court adopted recommendations from Pre-Trial Services that Waite be required to comply with Location Monitoring Program, specifically using GPS for home detention. (D. 18).

6. On August 19, 2021, the Court adopted recommendations from Pre-Trial Services that Waite be reduced to curfew status. (D. 30).

7. On March 15, 2022, a bond hearing was held to address violations of the conditions of Waite's release. The Court did not order any changes. (Doc. 51).

8. On April 6, 2022, Waite requested that he be allowed to travel to Pewaukee, WI for an overnight vacation with his family from April 18, 2022, and return to Milwaukee, WI on April 19, 2022, and staying at the Ingleside Hotel, 2810 Gulf Rd., Pewaukee, WI. (D.55). In a text order issued on April 6, 2022, the Court approved the request.

9. Waite now requests to change the location of the overnight stay due to financial reasons. Waite requests that he be allowed to travel to Brookfield, WI for an overnight vacation with his family from April 18, 2022, and return to Milwaukee, WI on April 19, 2022, and staying at the Country Inn & Suites, 1250 S. Moorland Rd., Brookfield, WI.

10. The undersigned counsel consulted with USPO Michael Karolewicz, who is supervising Waite, regarding this request and he indicated that he has no objections.

11. The undersigned counsel consulted with AUSA Karine Moreno-Taxman regarding this request, and she indicated that the Government has no objections.

For the reasons stated herein, Waite respectfully requests that the Court modify the conditions of release to allow him to travel to Brookfield, WI from April 18, 2022, to April

19, 2022.

Dated at Milwaukee, Wisconsin this 15th day of April 2022.

Respectfully submitted,

By: /s/ Daniel H. Sanders
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